

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MICHAEL J. MADIGAN  
and MICHAEL F. McCLAIN

No. 22 CR 115

Hon. John Robert Blakey

**GOVERNMENT'S MOTION FOR LEAVE TO FILE OVERSIZED RULE 404(B)  
MOTION AND SANTIAGO PROFFER INSTANTER**

The UNITED STATES OF AMERICA, by its attorney, MORRIS PASQUAL, Acting United States Attorney for the Northern District of Illinois, respectfully submits the following *instanter* motion for leave to file the following briefs in excess of the 30-page limit pursuant to the Court's standing order for motions *in limine* and the 15-page limit set forth in Northern District of Illinois Local Rule 7.1: (i) the government's *Santiago* proffer, and (ii) the government's consolidated motions *in limine* to admit evidence as direct evidence of the racketeering enterprise or, in the alternative, under Federal Rule of Evidence 404(b).

This is one of the largest and most significant public corruption cases to be brought in this district in the last several decades. It involves a 23-count indictment, with a racketeering charge and multiple other conspiracies and joint ventures that span over eight years. Owing to the complexity of this case and the fact that there are two defendants set to go to trial, the government respectfully requests leave to have up to 225 pages for its *Santiago* proffer (which discusses the evidence of multiple charged conspiracies and joint ventures) and up to 52 pages to file its consolidated motions *in*

*limine* related to Rule 404(b).

The government respectfully requests that the Court enter an order (i) granting the motion; and (ii) granting such other and further relief as is just and proper.

Respectfully submitted.

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